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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Federal Communications Commission**

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Parts 21, 22, 23,  
and 25 of the Commission's Rules to  
Require Reporting of Station Frequency  
and Technical Parameters for  
Registration by the Commission with  
the International Frequency  
Registration Board

CC Docket No. 92-160 /

**REPLY COMMENTS OF MOBILE MARINE RADIO, INC.**

Mobile Marine Radio, Inc., respectfully submits this Reply pertaining to the Commission's proposal to create an automated database to improve the reporting of frequency assignments to the International Frequency Registration Board ("IFRB").<sup>1/</sup>

**I. INTRODUCTORY STATEMENT**

MMR, the licensee of public coast station WLO at Mobile, Alabama, under its present management, has rendered public coast station telecommunications services to the maritime community since 1947. MMR renders high seas, regional and local radiotelephony and radiotelegraph services to ships at sea throughout the world. MMR's

<sup>1/</sup> 7 FCC Rcd. 5066 (1992). MMR respectfully requests the Commission to accept this Reply two (2) days after the scheduled due date. The delay in filing resulted from coordination delays between the Company and undersigned counsel. Based on the position expressed in this Reply, no party is prejudiced by this minor delay in filing.

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operating frequencies are registered with the IFRB for international notification and coordination purposes.

II. REPLY COMMENTS

In this rulemaking, the Commission looks toward requiring licensees in the common carrier services licensed under Parts 21, 22, 23 and 25 to file information relating to IFRB coordination in a computer readable format. The underlying intent is to enhance the Commission's reporting of frequency assignments made by the Commission to U.S. entities to the IFRB for international registration and coordination purposes.

In addition to reporting of services licensed under Parts 21, 22, 23 and 25 of the Commission's Rules to the IFRB, the Commission also reports station frequency and technical parameters of maritime public coast stations, licensed under Part 80. The need to maintain accurate and up-to-date records of U.S. licensees is no less critical for maritime carriers than for the classes of carriers embraced in the instant Notice. Indeed, there have been numerous instances wherein the IFRB's lists of maritime public coast station assignments were erroneous with regard to MMR and other U.S. coast stations.

Mobile Marine Radio, Inc. urges the Commission to allow maritime public coast stations also to report frequency and technical parameters in computer readable

format, and for the Commission to process information so received for IFRB reporting purposes. It is recognized that the Commission may be limited in its ability to mandate such reporting by Part 80 licensees in the instant proceeding, without the issuance of a further NPRM. Notwithstanding, the Commission could, consistent with the Administrative Procedure Act, and should, provide for the voluntary reporting of public coast station frequency assignment and technical parameters in machine-readable format, in accordance with Attachment 1 to the NPRM.

**WHEREFORE, THE PREMISES CONSIDERED,** Mobile Marine Radio, Inc. respectfully urges the Federal Communications Commission to provide for the reporting of maritime public coast station data for IFRB purposes consistent with the database automation contemplated in this proceeding.

Respectfully submitted,



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